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**ENVIRONMENTAL HEALTH DIVISION**

DATE: April 14, 2011  
TO: Clint Snyder / RWQCB  
FROM: Marina Winslow / LEA *mw*  
RE: Tentative WDR for Butte County Neal Road Class III Solid Waste Landfill

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Mr. Snyder:

Butte County LEA received Tentative Waste Discharge Requirements (WDR) for Neal Road Recycling and Waste Facility (NRRWF, former Neal Road Landfill). The Discharger requested a revision of the existing document to allow for the discharge of treated wood waste.

After the review of the proposed WDR the LEA has the following comments:

1) Paragraph 3 on page 1:

**3. The Discharger proposes an additional expansion of the landfill disposal footprint to the west and south of the existing disposal area resulting in a total disposal footprint of approximately 140 acres (Modules 5 through 10) as shown in Attachment B. This expansion is expected to proceed following the completion of Module 4. –**

This statement could be confusing to the public. The expansion of the landfill disposal footprint to 140 acres has been adopted by SWQCB in 2002 and permitted through Solid Waste Facility Permit revision in 2005. The Discharger does not propose an expansion of the disposal footprint at this time.

The LEA suggests change the language of the paragraph to reflect permitted 140 acres and construction of new Modules Five through Ten after completion of existing Module Four.

2) The LEA has determined that an amendment of the NRRWF operating document, Joint Technical Document (JTD), will be necessary to address the new type of waste accepted at the facility.

Please contact me if you have any questions: (530) 538-5321 or [mwinslow@buttecounty.net](mailto:mwinslow@buttecounty.net).

cc: Bill Mannel / Butte County Public Works

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